

**REMARKS**

In accordance with the foregoing, claims 1, 5, 6, and 19 have been amended, and claims 1-25 are pending and under consideration. No new matter is presented in this Amendment.

**REJECTIONS UNDER 35 U.S.C. §102:**

Claims 1-3, 10 and 12 are rejected under 35 U.S.C. §102(b) as being anticipated by Herigstad et al. (U.S. Publication 2004/0174400), hereinafter "Herigstad." The Applicants respectfully traverse the rejection and request reconsideration.

Regarding the rejection of independent claim 1, it is noted that amended claim 1 teaches an interpreting of an object program for displaying an object picture embedded in a markup picture to generate input item map information necessary for focusing on input items in the object picture. In contrast, Herigstad only discloses a partitioning of a visual display of an electronic device whereby each of the partitioned regions is associated with a key on a keypad of the electronic device. That is, Herigstad does not suggest an interpreting of an object program for the object picture or input item map information for an object picture. In particular, Herigstad does not suggest an object program obtained from a markup document, as taught in amended claim 1. Specifically, the Examiner cites paragraph [0041], lines 15-22 as a teaching of interpreting an object program to generate input item map information. However, paragraph [0041], lines 15-22 only discloses a storage to hold programs and data, including a WML web browser containing a WML interpreter. The WML interpreter does not interpret the stored programs and data, as suggested by the Examiner, nor does the WML interpreter interpret an object program for an object picture embedded in a markup picture. Rather, the WML interpreter interprets markup (WML) contents provided by a web server and viewed on the web browser (see Herigstad, paragraph [0040]). Therefore, the Applicants respectfully submit that Herigstad fails to disclose, implicitly or explicitly, an interpreting of an object program obtained from a markup document to generate input item map information necessary for focusing on input items, as recited in amended claim 1.

Regarding the rejection of claim 2, it is noted that this claim depends from claim 1 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 2 recites the object program having "an independent program structure according to an extensible markup language (XML) document and a Java program." In contrast, the stored programs, which may be Java programs, referred to by the Examiner in paragraph [0041] of Herigstad are

not object programs to display an object picture having the input items (the WML interpreter interprets the web content, not the stored programs, to create the input items). Thus, the Java program recited in claim 2 is patentably distinct from the programs recited by Herigstad. Therefore, the Applicants respectfully submit that Herigstad fails to disclose, implicitly or explicitly, the interpreted object program having an independent program structure according to an XML document and a Java program, as recited in claim 2.

Regarding the rejection of claim 3, it is noted that this claim depends from claim 1 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 3 recites a generating of the input item map information based on information on **input item types**, input item position information, and input item identification information. In contrast, Herigstad teaches the generating of inputs according to a position of input items (each key of the keypad corresponds to a region of the visual display). Herigstad makes no mention of the types of input items. Therefore, the Applicants respectfully submit that Herigstad fails to disclose, implicitly or explicitly, the generating of the input item map information based on information on input item types, as recited in claim 3.

Regarding the rejection of independent claim 10, it is noted that claim 10 recites "an object program to display an object picture having at least one input item and embedded in a markup picture formed by the markup document." In contrast, the input items of Herigstad are included in a markup (WML) document (paragraph [0040]) and not an object program. Specifically, referring to FIG. 8 of Herigstad, the labels 160 and 162 cited by the Examiner are not object pictures, but are input items encoded in the WML content provided by the web server (paragraph [0040]). Furthermore, it is noted that claim 10 recites "the object program containing information on an input item type... necessary for generating input item map information." In contrast, Herigstad teaches the generating of inputs according to a position of input items (each key of the keypad corresponds to a region of the visual display). Herigstad makes no mention of the types of input items. Therefore, the Applicants respectfully submit that Herigstad fails to disclose, implicitly or explicitly, an object program displaying an object picture having at least one input item and embedded in a markup picture, wherein the object program contains information on an input item type necessary for generating input item map information.

Regarding the rejection of claim 12, it is noted that this claim depends from claim 10 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 12 recites the object program having "an independent program structure according to an

extensible markup language (XML) document and a Java program.” In contrast, the stored programs, which may be Java programs, referred to by the Examiner in paragraph [0041] of Herigstad are not object programs to display an object picture having the input items (the WML interpreter interprets the web content, not the stored programs, to create the input items). Thus, the Java program recited in claim 12 is patentably distinct from the programs recited by Herigstad. Therefore, the Applicants respectfully submit that Herigstad fails to disclose, implicitly or explicitly, the interpreted object program having an independent program structure according to an XML document and a Java program, as recited in claim 12.

### **REJECTIONS UNDER 35 U.S.C. §103:**

Claims 4-9, 13-17 and 19-20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad in view of Xu et al. (U.S. Patent 6,907,574), hereinafter “Xu.” The Applicants respectfully traverse and request reconsideration.

Regarding the rejection of claim 4, it is noted that this claim depends from claim 3 and is, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of independent claim 5, it is noted that amended claim 5 now recites a transmitting of a message from a markup interpretation engine to an object interpretation engine “for moving an input item focus **from the markup picture** to the object picture.” In contrast, Xu teaches a method of enumerating frames in a browser window so as to enable moving a focusing **from a frame** (object picture) to another frame (another object picture). That is, the communication disclosed in Xu consists of a program function call in the Web page document that enumerates the object frames for moving an input item focus from one frame to another frame, rather than “from the markup picture to the object picture.” Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a transmitting of a message from a markup interpretation engine to an object interpretation engine for moving an input item focus from the markup picture to the object picture, as recited in claim 5.

Regarding the rejection of independent claim 6, it is noted that amended claim 6 now recites a transmitting of a message from an object interpretation engine to a markup interpretation engine “for moving an input item focus from the object picture **to the markup picture**.” In contrast, Xu teaches a method of enumerating frames in a browser window so as to

enable moving a focusing from a frame (object picture) **to another frame** (another object picture). That is, the communication disclosed in Xu consists of a program function call in the Web page document that enumerates the object frames for moving an input item focus from one frame to another frame, rather than “from the object picture to the markup picture.” Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a transmitting of a message from an object interpretation engine to a markup interpretation engine for moving an input item focus from the object picture to the markup picture, as recited in claim 6.

Regarding the rejection of claim 7, it is noted that this claim depends from claim 5 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 7 recites the message transmission comprising “transmitting information on a position of a **currently focused markup picture input item.**” In contrast, Xu teaches a method of enumerating object frames for moving an **object input item focus** (i.e., moving the input item from one object frame to another object frame). Therefore, the Applicants respectfully submit that Xu fails to disclose a transmission of information on a position of a currently focused markup picture input item, as recited in claim 7.

Regarding the rejection of claim 8, it is noted that this claim depends from claim 7 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 8 recites a moving of “the focus from **the currently focused markup picture input item** to a next object picture input item.” In contrast, Xu teaches a method of enumerating object frames for moving an **object input item focus** (i.e., moving the input item from one object frame to another object frame). Therefore, the Applicants respectfully submit that Xu fails to disclose a moving of the focus from the markup picture input item to the object picture input item, as recited in claim 8.

Regarding the rejection of claim 9, it is noted that this claim depends from claim 5 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 9 recites a moving of “the focus from **the currently focused markup picture input item** to a next object picture input item.” In contrast, Xu teaches a method of enumerating object frames for moving an **object input item focus** (i.e., moving the input item from one object frame to another object frame). Therefore, the Applicants respectfully submit that Xu fails to disclose a moving of the focus from the markup picture input item to the object picture input item, as recited in claim 9.

Regarding the rejection of independent claim 13, it is noted that claim 13 recites “an object program to display an object picture having at least one input item and embedded in a markup picture formed by the markup document.” In contrast, the input items of Herigstad are included in a markup (WML) document (paragraph [0040]) and not an object program. Specifically, referring to FIG. 8 of Herigstad, the labels 160 and 162 cited by the Examiner are not object pictures, but are input items encoded in the WML content provided by the web server (paragraph [0040]). Furthermore, it is noted that claim 13 recites “the object program containing information on an input item type... necessary for generating input item map information.” In contrast, Herigstad teaches the generating of inputs according to a position of input items (each key of the keypad corresponds to a region of the visual display). Herigstad makes no mention of the types of input items. Therefore, the Applicants respectfully submit that Herigstad fails to disclose, implicitly or explicitly, an object program displaying an object picture having at least one input item and embedded in a markup picture, wherein the object program contains information on an input item type necessary for generating input item map information.

Furthermore, regarding the rejection of independent claim 13, it is noted that claim 13 also recites “transmitting a message for moving a focus on one of the object picture input items... and focusing on one of the markup picture input items... in response to the message.” In contrast, Xu (col. 14, lines 33-41) teaches a method of enumerating frames in a browser window so as to enable moving a focusing from a frame (object picture) **to another frame** (another object picture). That is, the communication disclosed in Xu consists of a program function call in the Web page document that enumerates the object frames for moving an input item focus from one frame to another frame, rather than from an object picture input item to a markup picture input item. Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, transmitting a message for moving a focus on one of the object picture input items to one of the markup picture input items in response to the message, as recited in claim 13.

Regarding the rejection of claim 14, it is noted that this claim depends from claim 13 and is, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of claim 15, it is noted that this claim depends from claim 13 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 15 recites a moving of “the focus from a currently focused object picture input item to a next **markup picture input item.**” In contrast, Xu teaches a method of enumerating object

frames for moving an **object input item focus** (i.e., moving the input item from one object frame to another object frame). Therefore, the Applicants respectfully submit that Xu fails to disclose a moving of the focus from the object picture input item to the markup picture input item, as recited in claim 15.

Regarding the rejection of claim 16, it is noted that this claim depends from claim 13 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 16 recites a moving of “the focus from a currently focused object picture input item to a next focused **markup picture input item**.” In contrast, Xu teaches a method of enumerating object frames for moving an **object input item focus** (i.e., moving the input item from one object frame to another object frame). Therefore, the Applicants respectfully submit that Xu fails to disclose a moving of the focus from the object picture input item to the markup picture input item, as recited in claim 16.

Regarding the rejection of independent claim 17, it is noted that claim 17 recites “moving an input item focus among the markup picture input items and the object picture input items according to a predetermined order.” In contrast, Xu (col. 14, lines 33-41) teaches a method of enumerating frames in a browser window so as to enable moving a focusing from a frame (object picture) **to another frame** (another object picture). That is, Xu discloses a program function call in the Web page document that enumerates the object frames for moving an input item focus from one frame to another frame, rather than from an object picture input item to a markup picture input item or from a markup picture input item to an object picture input item. Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, moving an input item focus among markup picture input items and object picture input items, as recited in claim 17.

Regarding the rejection of claim 19, it is noted that this claim depends from claim 17 and is, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of claim 20, it is noted that this claim depends from claim 19 and is, therefore, allowable for at least the reasons set forth above.

Claim 11 is rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad in view of Mobini et al. (U.S. Patent 6,564,255), hereinafter “Mobini.” The Applicants respectfully traverse and request reconsideration. Regarding the rejection of claim 11, it is noted that this claim depends from claim 10 and is, therefore, allowable for at least the reasons set forth above.

Claim 21 is rejected under 35 U.S.C. §103(a) as being unpatentable over Mobini in view of Xu. The Applicants respectfully traverse and request reconsideration. Regarding the rejection of independent claim 21, it is noted that claim 21 recites “moving an input item focus among the markup picture input items and the DVD object picture input items according to a predetermined order.” In contrast, Xu (col. 14, lines 33-41) teaches a method of enumerating frames in a browser window so as to enable moving a focusing from a frame (object picture) to **another frame** (another object picture). That is, Xu discloses a program function call in the Web page document that enumerates the object frames for moving an input item focus from one frame to another frame, rather than from an object picture input item to a markup picture input item or from a markup picture input item to an object picture input item. Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, moving an input item focus among markup picture input items and object picture input items, as recited in claim 21.

Claims 18 and 22-25 are rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad in view of Xu and further in view of Mobini. The Applicants respectfully traverse and request reconsideration.

Regarding the rejection of claim 18, it is noted that this claim depends from claim 17 and is, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of independent claim 22, it is noted that claim 22 recites “moving an input item focus among the interactive picture input items and the object picture input items according to a predetermined order.” In contrast, Xu (col. 14, lines 33-41) teaches a method of enumerating frames in a browser window so as to enable moving a focusing from a frame (object picture) to **another frame** (another object picture). That is, Xu discloses a program function call in the Web page document that enumerates the object frames for moving an input item focus from one frame to another frame, rather than from an object picture input item to a markup (interactive) picture input item or from a markup (interactive) picture input item to an object picture input item. Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, moving an input item focus among interactive picture input items and object picture input items, as recited in claim 22.

Regarding the rejections of claims 23-25, it is noted that these claims depend from claim 22 and are, therefore, allowable for at least the reasons set forth above.

Based on the foregoing, this rejection is respectfully requested to be withdrawn.

**CONCLUSION:**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 503333.

Respectfully submitted,

STEIN, MCEWEN & BUI, LLP

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4/30/07

By: \_\_\_\_\_



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